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248; *Fuller v. Bilz*, 161 Mich. 589, 126 N. W. 712; *Cobb v. Davenport*, 32 N. J. L. 369; *Hinckley v. Peay*, 22 Utah, 21, 60 Pac. 1012. Cf. *Gouverneur v. National Ice Co.*, *supra*, with *Geneva v. Henson*, 140 App. Div. 49, 124 N. Y. Supp. 588. Other states reserve title only in the case of non-navigable lakes. *Broward v. Mabry*, 59 Fla. 398, 50 So. 826; *Lamprey v. State*, 52 Minn. 101, 53 N. W. 1139; *Conneaut Lake Ice Co. v. Quigley*, 225 Pa. 605, 74 Atl. 648. Cf. *Webster v. Harris*, 111 Tenn. 668, 69 S. W. 782. The rights of the public would be sufficiently protected if riparian owners held in fee lake beds subject to a public easement to the use of the waters. Such is the rule in Michigan. *People v. Horling*, 137 Mich. 406, 100 N. W. 691.

DOMICILE — RIGHT OF AN INFANT ORPHAN TO CHOOSE. — The plaintiff was born in Massachusetts and resided there with his parents. When eight years old he was hurt by the defendant railroad and suit was started in a Massachusetts court. Then his parents died, and at the age of nineteen he moved to Maine to live with an aunt. At the age of twenty the plaintiff sued the defendant, a Massachusetts corporation in a federal court on the ground of diversity of citizenship. *Held*, the plaintiff was domiciled in Maine. *Bjornquist v. Boston & A. R. Co.*, 250 Fed. 929.

The domicile of an infant orphan is the domicile of the last surviving parent and cannot ordinarily be changed by any act of the infant. *Ex parte Dawson*, 3 Bradf. (N. Y.) 130; *In re Henning*, 128 Cal. 214, 60 Pac. 762; *In re Benton*, 92 Ia. 202, 60 N. W. 614; *Vennard's Succession*, 44 La. Ann. 1076, 11 So. 705. The reason is, "a person who is under the power and authority of another possesses no right to choose a domicile." See STORY, CONFLICT OF LAWS, 41. And so grandparents — but no others — who are regarded as natural parents with control of an infant orphan, have been allowed to change the domicile of the infant. *In re Benton*, 92 Ia. 202, 60 N. W. 614; *Kirkland v. Whateley*, 86 Mass. 462; *Mintzer's Estate*, 2 Pa. Dist. R. 584. There is not, however, this identity of domicile where the guardian is not a natural but an appointed one, since he has no right to change the domicile of the orphan outside the state of appointment. *Daniel v. Hill*, 52 Ala. 430; *Lamar v. Micou*, 112 U. S. 452. Where an infant has been emancipated by his parents he has been held able to change his own domicile. *Russell v. State*, 62 Neb. 512, 87 N. W. 344. See 19 HARV. L. REV. 215. To prove emancipation it is necessary only to show that by circumstances the infant has been freed from his father's control. *Sword v. Keith*, 31 Mich. 247; *Jacobs v. Jacobs*, 130 Ia. 10, 104 N. W. 489; *Bristol v. Chicago & N. W. R. R.*, 128 Ia. 479, 104 N. W. 487; *West Gardiner v. Manchester*, 72 Me. 509. An infant orphan who has reached an age of discretion and is without grandparents or guardian should be regarded as emancipated by circumstances, since he is under the control of no one. Being emancipated, he is then capable of choosing his own domicile and the principal case is clearly right.

ELECTIONS — NOTICE TO NONRESIDENT VOTERS — RIGHT TO VOTE. — The Constitution of New Jersey allows voters engaged in military service outside the election district to vote. Pursuant to this authority, a statute provides the method by which such voters shall be notified of impending elections. ACT FEB. 28, 1918, §§ 4-6, 9, P. L. 437. A special election on the liquor question was held in which these statutory requirements as to notice were not complied with, and the number of voters thereby disfranchised was sufficient to have changed the result. *Held*, that the election be set aside. *In re Holman*, 104 Atl. 212 (N. J.).

Where the time and place of an election are designated by law, statutory provisions as to the notice which must be given voters are construed to be merely directory. *Commonwealth v. Kelly*, 255 Pa. 475, 100 Atl. 272; *Kleist*